

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

MALIBU MEDIA, LLC,

Plaintiff,

v.

ZUBER HEWRAMI,

Defendant.

CASE NO.: 1:15-cv-00855-GBL-IDD

**PLAINTIFF'S FIRST MOTION FOR EXTENSION OF TIME WITHIN
WHICH IT HAS TO EFFECTUATE SERVICE ON DEFENDANT ZUBER HEWRAMI**

Pursuant to Fed. R. Civ. P. 4(m), Plaintiff, Malibu Media, LLC ("Plaintiff"), moves for entry of an order extending the time within which to effectuate service on Defendant Zuber Hewrami, and states:

1. On July 2, 2015, Plaintiff filed its Motion for Leave to Serve a Third Party Subpoena [CM/ECF 4].

2. On July 14, 2015, Plaintiff was granted leave to serve a third party subpoena on Defendant's ISP, Comcast Cable Communications Management, LLC, to obtain the Defendant's identifying information [CM/ECF 7]. Plaintiff issued the subpoena on or about July 14 2015, and received the ISP's response on August 31, 2015.

3. After concluding its investigation, Plaintiff made the decision to proceed with its claims against the subscriber and amended its Complaint naming Defendant Zuber Hewrami, on October 22, 2015 [CM/ECF 9]. A Summons was issued as to Zuber Hewrami on October 23, 2015 [CM/ECF 10].

4. Plaintiff immediately instructed its process server to begin attempting service on Defendant Zuber Hewrami. Upon effectuating service on the Defendant, Plaintiff will file an Affidavit of Service with this Court.

5. Pursuant to Fed. R. Civ. P. Rule 4(m), Plaintiff is required to effectuate service on Defendant no later than October 30, 2015.

6. Procedurally, Plaintiff respectfully requests that the time within which it has to effectuate service of the summons and Complaint on Defendant Zuber Hewrami be extended an additional thirty (30) days, or until November 30, 2015.

WHEREFORE, Plaintiff respectfully requests that the time within which it has to effectuate service of the summons and Complaint on Defendant Zuber Hewrami be extended an additional thirty (30) days, or until November 30, 2015. A proposed order is attached for the Court's convenience.

Dated: October 30, 2015

Respectfully submitted,

By: /s/ William E. Tabot, Esq
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ William E. Tabot